

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Oscar Londono	:	Chapter 13
	:	Case No.: 21-10156-MDC
Debtor(s)	:	

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

Debtor, by and through the undersigned counsel, hereby move this Honorable Court to Modify their Chapter 13 Plan and in support thereof avers as follows:

1. Debtor filed a Chapter 13 Petition on January 22, 2021.
2. The Chapter 13 Plan was confirmed on May 20, 2021.
3. The Internal Revenue Service filed an Amended Proof of Claim on September 13, 2021 in the amount of \$8,817.34.
4. In addition, the Pennsylvania Department of Revenue filed a post-confirmation priority Proof of Claim (#14-1) in the amount of \$1,930.79.
5. Debtor has paid \$7,630.00 to the Chapter 13 Trustee to date.
6. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$726.00 per month for the remaining 48 months for a new base amount of \$42,478.00.

WHEREFORE, the Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan in consideration of the Priority Proof of Claims of the Internal Revenue Service and the Pennsylvania Department of Revenue.

Dated: February 8, 2022

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